

UNITED STATES BANKRUPTCY COURT
THE SOUTHERN DISTRICT OF NEW YORK

In re:
GENERAL MOTORS CORP., *et al.*,
Debtors

CHAPTER 11
Case No 09-50026 (REG)
(Jointly Administered)

MOTION TO EXTEND DEADLINE FOR THE CURE OBJECTION

WALKER PRODUCTS, INC., dba Specialized Motor Systems, Inc. (collectively referred to herein as “SMS”), appearing on their own behalf, hereby submits this Motion requesting an extension of time to respond to the NOTICE OF (I) DEBTORS’ INTENT TO ASSUME AND ASSIGN CERTAIN EXECUTORY CONTRACTS, UNEXPIRED LEASES OF PERSONAL PROPERTY, AND UNEXPIRED LEASES OF NONRESIDENTIAL REAL PROPERTY AND (II) CURE AMOUNTS RELATED THERETO.

Please take Notice that:

1. On June 1, 2009 (the “Petition Date”), General Motors Corporation and its affiliated debtors (collectively, the “Debtors”) each filed voluntary petitions for relief under Chapter 11 of the Bankruptcy Code.
2. On June 2, 2009, this Court entered an Order (the “Bidding Procedures Order”) which includes procedures regarding Debtors’ assumption and assignment of executory contracts.
3. Pursuant to the Bidding Procedures Order, the Debtors mailed Notices of (I) Debtors’ Intent To Assume And Assign Certain Executory Contracts, Unexpired Leases Of Personal Property, And Unexpired Leases of Nonresidential Real Property and (II) Cure Amounts Related Thereto (the “Notices”). The Notices indicate that the Debtors intend to assume and assign some or all of the Debtors’ contracts with some or all of SMS (the “SMS Contracts”).
4. The Notices are dated June 15, 2009, and were received by SMS on June 25, 2009. Objections are due ten days after the date of the Notice.

5. On their Contract Website, the Debtors identify 3 SMS Contracts and \$98,890.40 as the amount which they allege to be owing under the SMS Contracts (the "Proposed Cure Amount"). Our initial review shows the Debtors to owe additional amounts of \$215,998.98 and \$79,825.80. We are requesting the extension of time to confirm and document these amounts.

6. Due to the fact the Notices were received on the objection deadline, did not provide SMS sufficient time to review and evaluate the SMS Contracts and the Proposed Cure Amount.

7. SMS respectfully requests two additional weeks from the date the Notices were received, June 25, 2009, to file a Cure Objection outlining the specific details of their objection to the Contracts and Proposed Cure Amount.

WHEREFORE, this party respectfully requests entry of an order granting a two week extension to file a Cure Objection or an extension period that the Court deems reasonable and such other and further relief as is just.

Dated: June 26, 2009



Ronda Bowen
Director of Finance
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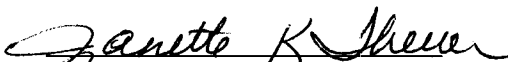


STATE OF COLORADO

County of Mesa)SS:
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On this, the 26 day of June, 2009, before me a notary public, the undersigned officer, personally appeared Ronda Bowen, known to me (or satisfactorily proven) to be the person whose name is subscribed to the within instrument, and acknowledged that he executed the same for the purposes therein contained.

In witness hereof, I hereunto set my hand and official seal.


Notary Public

My Commission Expires January 19, 2010

CERTIFICATE OF SERVICE

I, Ronda Bowen, hereby certify that on this 26th day of June, 2009 true and exact copies of the foregoing **MOTION TO EXTEND DEADLINE FOR THE CURE OBJECTION** was served as follows: (1) via electronic mail from Walker Products and via first-class U.S. mail, postage prepaid, upon all parties listed below for whom electronic mail addresses are listed there on and (2) via facsimile transmission to the fax numbers indicated for the parties designated below as receiving facsimile service.

CLERK for the Honorable Judge Gerber
Case No. 09-50026 (REG)
United States Bankruptcy Court
Southern District of New York
One Bowling Green
New York, NY 10004-1408
[VIA FEDEX Mail]

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Warren Michigan 48090-9025
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